

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 4

WILKES-BARRE HOSPITAL COMPANY, LLC :
D/B/A WILKES-BARRE GENERAL HOSPITAL :

versus

WYOMING VALLEY NURSES :
ASSOCIATION / PENNSYLVANIA :
ASSOCIATION OF STAFF AND NURSING :
PROFESSIONALS :

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: Case Nos. 04-CA-259936
: 04-CA-2600365
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RESPONDENT’S MOTION TO EXTEND HEARING DATE

As the Respondent in the above-captioned cases, Wilkes-Barre Hospital Company, LLC d/b/a Wilkes-Barre General Hospital (hereafter, the “Hospital”) hereby requests, by and through its Undersigned Counsel, that the hearing date in the above-captioned cases be extended from December 8, 2020 to a date to be determined. The Hospital’s request has been submitted to the Regional Director, insofar as more than twenty-one days remain before the scheduled hearing date. See Board’s Rules and Regulations, § 102.16(a)(5).

The Undersigned will very likely be unavailable for most of December due to surgery. The Undersigned developed an infection following a recent knee surgery. Due to the infection, the Undersigned was hospitalized from October 4, 2020 to October 12, 2020. During the course of the Undersigned’s hospital stay,

there was a need to debride the site of the previous surgical procedure.

Consequently, the Undersigned was discharged with a large and deep wound on his leg that remains under the care of home health nurses and other healthcare providers.

The Undersigned had a need to go through another debridement procedure on October 30, 2020 and has been advised of the likely need for plastic reconstructive surgery. Because the wound is (literally) a moving target, no surgery has yet been scheduled, but as part of an examination performed by the Undersigned's plastic surgeon on November 6, 2020, the Undersigned was advised the reconstructive surgery would likely take place sometime between December 1 and December 15, 2020 and, following the procedure, the Undersigned would be under various restrictions for roughly two weeks thereafter.

Jonathan Walters, Counsel for the Charging Party, has advised the Undersigned that the Charging Party does not oppose the Hospital's requested extension. The Hospital would be free for a hearing on January 27 to January 29, 2021.

WHEREFORE, the Company respectfully requests that the hearing date be extended from December 8, 2020 to a date to be determined.

Dated: Glastonbury, Connecticut
 November 10, 2020

Respectfully submitted,

/s/ _____

Bryan T. Carmody
Attorney for Respondent
134 Evergreen Lane
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CERTIFICATE OF SERVICE

The Undersigned, Bryan T. Carmody, being an Attorney duly admitted to the practice of law, does hereby certify, pursuant to 28 U.S.C. § 1746, that, on November 10, 2020, the Respondent's Motion to Extend Hearing Date was served upon the following *via* email:

Lea Alvo-Sadiky
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123 South Broad Street
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Dated: Glastonbury, Connecticut
November 10, 2020

Respectfully submitted,

/s/ _____

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